

MORRISON & FOERSTER LLP  
250 West 55<sup>th</sup> Street  
New York, New York 10019  
Telephone: (212) 468-8000  
Facsimile: (212) 468-7900  
Norman S. Rosenbaum  
Jordan A. Wishnew

*Counsel for The ResCap Borrower Claims Trust  
and The ResCap Liquidating Trust*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

_____	)	
In re:	)	Case No. 12-12020 (MG)
	)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,	)	Chapter 11
	)	
Debtors.	)	Jointly Administered
_____	)	

**PROPOSED AGENDA FOR MATTERS SCHEDULED TO BE HEARD  
ON SEPTEMBER 14, 2016 AT 10:00 A.M. (PREVAILING EASTERN TIME)**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,  
Alexander Hamilton U.S. Custom House, Courtroom 523, One Bowling Green, New York, NY  
10004-1408

**I. ADJOURNED MATTER(S)**

1. Sixty-Seventh Omnibus Objection to Claims (No Liability – Underwriter Indemnification Claims) [Docket No. 6988]

**Related Document(s):**

- a. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to July 30, 2014 at 10:00 a.m. [Docket No. 7081]
- b. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to August 13, 2014 at 10:00 a.m. [Docket No. 7238]

- c.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to August 26, 2014 at 10:00 a.m. [Docket No. 7281]
- d.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability Underwriter Indemnification Claims) to September 30, 2014 at 10:00 a.m. [Docket No. 7334]
- e.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to October 30, 2014 at 10:00 a.m. [Docket No. 7478]
- f.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to December 2, 2014 at 10:00 a.m. [Docket No. 7606]
- g.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability Underwriter Indemnification Claims) to December 18, 2014 at 10:00 a.m. [Docket No. 7719]
- h.** Notice of Withdrawal of ResCap Liquidating Trusts Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) Solely With Respect To Certain Claims [Docket No. 7721]
- i.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to January 14, 2015 at 10:00 a.m. [Docket No. 7792]
- j.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to February 11, 2015 at 10:00 a.m. [Docket No. 7903]
- k.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to March 12, 2015 at 10:00 a.m. [Docket No. 7996]
- l.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to March 31, 2015 at 10:00 a.m. [Docket No. 8124]
- m.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to April 30, 2015 at 10:00 a.m. [Docket No. 8233]
- n.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to June 23, 2015 at 10:00 a.m. [Docket No. 8417]

- o.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to September 3, 2015 at 10:00 a.m. [Docket No. 8648]
- p.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to November 18, 2015 at 10:00 a.m. [Docket No. 8986]
- q.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to January 7, 2016 at 10:00 a.m. [Docket No. 9269]
- r.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability Underwriter Indemnification Claims) to March 22, 2016 at 10:00 a.m. (ET) [Docket No. 9399]
- s.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability – Underwriter Indemnification Claims) to June 15, 2016 at 10:00 a.m. [Docket No. 9629]
- t.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability Underwriter Indemnification Claims) to September 14, 2016 [Docket No. 9899]
- u.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability – Underwriter Indemnification Claims) to November 17, 2016 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 10059]

**Response(s):** None.

**Status:** The hearing on this matter has been adjourned to November 17, 2016.

- 2.** ResCap Borrower Claims Trust's Objection to Claim No. 684 Filed by Bernard Ward and Colleen Halloran [Docket No. 9980]

**Related Document(s):**

- a.** Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Objection to Claim No. 684 Filed by Bernard Ward and Colleen Halloran to September 14, 2016 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 10025]
- b.** Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Objection to Claim No. 684 Filed by Bernard Ward and Colleen Halloran to October 13, 2016 at 2:00 p.m. (Prevailing Eastern Time) [Docket No. 10071]

**Response(s):** None.

**Status:** The hearing on this matter has been adjourned to October 13, 2016.

**II. STATUS CONFERENCE**

3. ResCap Borrower Claims Trust's Objection to Amended Claim No. 4445 Filed by Alan Moss [Docket No. 8502]

**Related Document(s):**

- a. Memorandum Opinion and Order Sustaining the ResCap Borrower Claims Trust's Objection to Amended Claim No. 4445 Filed by Alan Moss [Docket No. 9052]
- b. Opinion and Order of District Court Judge Lorna G. Schofield (S.D.N.Y. 15-cv-7140 (LGS)) [Docket No. 9921]
- c. Letter to Judge Glenn from Jordan A. Wishnew dated July 14, 2016 regarding District Court Decision Concerning Disposition of Proof of Claim of Alan Moss [Docket No. 9981]
- d. Notice of Status Conference on ResCap Borrower Claims Trust's Objection to Amended Claim No. 4445 Filed by Alan Moss to be Held on September 14, 2016 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 10074]

**Status:** The status conference on this matter will be going forward.

4. Borrower Claims Trust's General Status Conference

**Related Document(s):**

- a. Status Letter [To Be Submitted]

**Status:** The Borrower Claims Trust will be filing a status update prior to the hearing. The general status conference will be going forward.

**III. PRETRIAL CONFERENCE**

5. ResCap Borrower Claims Trust's Seventy-Fifth Omnibus Objection to Claims (No Liability Borrower Claims) [Docket No. 7552], *solely as it relates to Claim No. 3862 filed by Rhonda Gosselin*

**Related Document(s):**

- a. Order Allowing Rhonda Gosselin to Respond to the Second Supplemental Declaration of Deanna Horst [Docket No. 8112]

- b.** Memorandum Opinion and Order Sustaining in Part and Overruling in Part the ResCap Borrower Claims Trust's Objection to Claim No. 3862 Filed by Rhonda Gosselin [Docket No. 8516]
- c.** ResCap Borrower Claims Trust's Motion for Partial Reconsideration of the Court's Memorandum Opinion and Order Sustaining in Part and Overruling in Part the ResCap Borrower Claims Trust's Objection to Claim Number 3862 Filed by Rhonda Gosselin [Docket No. 8574]
- d.** Opposition of Rhonda Gosselin to [ResCap Borrower Claims Trust's Motion for Partial Reconsideration of the Court's Memorandum Opinion and Order Sustaining in Part and Overruling in Part the ResCap Borrower Claims Trust's Objection to Claim Number 3862 Filed by Rhonda Gosselin] [Docket No. 8646]
- e.** Order Granting the ResCap Borrower Claims Trust's Motion for Partial Reconsideration [Docket No. 8972]
- f.** Letter to Judge Glenn from Jordan A. Wishnew re: Status of Settlement of Claim No. 3862 [Docket No. 9038]
- g.** Motion to Withdraw as Attorney [by Laird J. Heal, Esq. as Counsel for Rhonda Gosselin] [Docket No. 9258]
- h.** Case Management & Scheduling Order for ResCap Borrower Claims Trust's Seventy-Fifth Omnibus Objection to Claims (Solely as it Relates to Claim No. 3862 Filed by Rhonda Gosselin) [Docket No. 9422]
- i.** Notice of Appearance [of Laird J. Heal, Esq. on Behalf of Rhonda Gosselin] [Docket No. 9749]
- j.** Memorandum Endorsed So-Ordered Letter Granting Extension of Deadlines [Docket No. 9754]
- k.** Pretrial Order [Docket No. 9959]
- l.** Letter to the Court by Laird J. Heal on Behalf of Rhonda Gosselin regarding Request for Additional Discovery [Docket No. 9961]
- m.** Letter to the Court by Jordan A. Wishnew on Behalf of the ResCap Borrower Claims Trust regarding Letter to the Court by Laird J. Heal on Behalf of Rhonda Gosselin [Docket No. 9967]
- n.** Order Denying Rhonda Gosselin's Request to Extend the Time to Take Discovery or to Amend Joint Pretrial Order Setting Forth Issues for Trial Scheduled for September 15, 2016 [Docket No. 9968]
- o.** Joint Status Letter dated September 8, 2016 [Not Docketed]

**Response(s):**

- a. Response of Rhonda Gosselin [to ResCap Borrower Claims Trust's Seventy-Fifth Omnibus Objection to Claims (No Liability Borrower Claims)] [Docket No. 7652]

**Reply:**

- a. ResCap Borrower Claims Trust's Supplemental Objection and Reply in Support of its Seventy-Fifth Omnibus Objection to Claims (No Liability Borrower Claims) as to Claim No. 3862 Filed by Rhonda Gosselin [Docket No. 7842]
  - (i) Declaration of Deanna Horst in Further Support of the ResCap Borrower Claims Trust's Supplemental Objection and Reply in Support of its Seventy-Fifth Omnibus Objection to Claims (No-Liability Borrower Claims) as to Claim No. 3862 Filed by Rhonda Gosselin [Docket No. 8007]

**Proposed Testimony:**

- a. Declaration and Proposed Testimony in Support of the ResCap Borrower Claims Trust's Seventy-Fifth Omnibus Objection to Claims (No Liability Borrower Claims) [Not Docketed]
- b. Rhonda Gosselin's Declaration and Proposed Testimony in Opposition to Objection to [Claim] No. 3862 [Not Docketed]

**Pretrial Briefs:**

- a. ResCap Borrower Claims Trust's Memorandum of Law in Support of the Trust's Objection to Claim Number 3862 [Docket No. 10078]
- b. Rhonda Gosselin's Trial Memorandum in Opposition to Objection to Claim Number 3862 [Docket No. 10091]

**Motions *In Limine***

- a. ResCap Borrower Claims Trust's Motion *In Limine* to Exclude Testimony of Rhonda Gosselin [Docket No. 10093]

**Status:** The pretrial conference on this matter will be going forward.

**IV. UNCONTESTED MATTERS**

6. ResCap Borrower Claims Trust's Ninety-Fourth Omnibus Objection to Claims ((I) No Liability Borrower Claims, (II) Redesignate, Reclassify, Reduce and Allow Borrower Claim, (III) Reclassify, Reduce and Allow Borrower Claim, and (IV) Redesignate and Allow Borrower Claim [Docket No. 9971]

**Related Document(s):**

- a. Notice of Withdrawal of Claim No. 4259 Filed by Haru Lindsey [Docket No. 10076]

**Response(s):** None.

**Status:** The hearing on this matter will be going forward.

7. ResCap Liquidating Trust's Second Omnibus Motion to Enforce Injunctive Provisions of Plan and Confirmation Order [Docket No. 10047]

**Related Document(s):** None.

**Response(s):** None.

**Status:** No objections have been filed. The Liquidating Trust received informal responses on behalf of three parties: Blake F. Sy, Patricia Alton, and George and Kathleen Sari. The Liquidating Trust is withdrawing the motion without prejudice with respect to those parties, and the hearing on this matter will be going forward with respect to all other parties.

Dated: September 12, 2016  
New York, New York

/s/ Norman S. Rosenbaum  
Norman S. Rosenbaum  
Jordan A. Wishnew  
MORRISON & FOERSTER LLP  
250 West 55th Street  
New York, New York 10019  
Telephone: (212) 468-8000  
Facsimile: (212) 468-7900

*Counsel for The ResCap Borrower Claims  
Trust and The ResCap Liquidating Trust*